

15 November 2019

Jason Desmond

Environment and Community Coordinator
Mt Owen / Glendell Operations
Singleton NSW 2330

Dear Jason

RE: Mount Owen Glendell Operations – Mining Operations Plan – 2020 to 2024

I refer to your email request dated 31 October 2019 requesting comment from Council on the Mount Owen Glendell Operations – Mining Operations Plan – 2020 to 2024 (**Mining Operations Plan**). This letter forms Council's feedback in relation to that request.

The Mining Operations Plan relates to three approved mining areas within the Mount Owen Mining Complex, Glendell Mine (with mining cessation in 2024), Ravensworth Mine, limited to the area of Ravensworth approved under SSD5850 incorporating Ravensworth East (with mining cessation in 2023), and the Mount Owen Mine (with mining cessation in 2037).

The Glendell Mine is within five (5) years of mine closure. As such, detailed mine closure planning for the Glendell Mine should have commenced in accordance with the conditions of approval. This detailed mine closure planning should include consultation with Singleton Council.

The Mining Operations Plan states that, whilst this is the case, *Glencore are currently preparing an application for the GCOP which will seek approval to extend open cut mining operations north from the Barrett Pit extracting approximately 140 Mt ROM Coal and extending the mine life to 2044. Should the GCOP not be approved, Glendell would commence detailed closure planning.* Council considers that reliance on the potential for a new project approval is not an adequate justification to delay mine closure planning for the current operations. In addition, given the short time frame until the current approval expires, Council considers that it would be imperative to include detailed mine closure planning within a revised Mining Operations Plan, that includes both a timetable for completion of a detailed mine closure plan and a stakeholder engagement plan to underpin closure planning outcomes.

The Ravensworth Mine, whilst approved for mining until 2037, is within five (5) years of cessation of mining. There is limited detail within the Mining Operations Plan as to how rehabilitation activities post cessation would be undertaken, or whether the mining area would remain in a 'care and maintenance' phase, and therefore un-rehabilitated, until 2037. It is unclear when the mine closure date for the Ravensworth Mine will occur, thereby triggering the development of a detailed mine closure plan.

The Mining Operations Plan would benefit from a detailed timeline of exploration, mining, rehabilitation, decommissioning and closure activities for the three mining areas.

In addition, all detailed mine closure impact planning, including final landform finalisation, groundwater impacts post closure, social impacts of closure and final void management are all proposed to be deferred until the mine closure planning phase has commenced. The Mining Operations Plan states that these assessments would be included in a mine closure plan that would be submitted to the relevant authorities for approval, two years prior to cessation of mining. The development of a final landform occurs during overburden emplacement, as such, it is difficult to retrofit an alternative landform outcome once this has occurred. The Mining Operations Plan should include detailed final landform design that has taken into consideration issues and opportunities raised during consultation with the community, government agencies and other stakeholders, and identify what, if any, adjustments have been made as a result of this consultation.

With the above in mind, and with the conditions of approval, within Table 10 of SSD 5850, including a requirement to minimise the socio-economic effects of mine closure, any rehabilitation activities undertaken during the life of the Mining Operations Plan require review against the needs and expectations of the community, such that any adverse impacts (including reduced access to land for development) are identified, acknowledged and mitigated. The Mining Operations Plan states in Table 17 that these effects are discussed in section 4.3. There is no discussion in the Mining Operations Plan of how the activities proposed within the Plan will minimise the effects of closure on the community.

Relinquishment of mining tenements at the end of mine life relies heavily on community endorsement of final land use and the ability of the final landform to provide for future land use outcomes that are sustainable post mining. The current zoning provides an indication of the community expectation post mining. However, there is no discussion within the Mining Operations Plan of how the rehabilitation outcomes, will:

- Encourage sustainable primary industry production by maintaining and enhancing the natural resource base.
- encourage diversity in primary industry enterprises and systems appropriate for the area.
- minimise the fragmentation and alienation of resource lands.
- minimise conflict between land uses within this zone and land uses within adjoining zones.

Council considers that further discussion is required to provide greater certainty around how the rehabilitation activities proposed within the Mining Operations Plan would achieve outcomes consistent with surrounding land uses and community expectations.

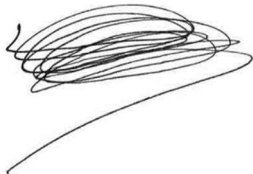
Table 34 identifies the threats to rehabilitation and includes a number of site specific threats, such as contamination of land and subsidence. Other threats, such as land use conflict, declining rainfall, increased bushfire risks and the impacts of climate change (resulting in higher intensity storm events and flooding) have not been

considered or included in the Mining Operations Plan. In addition, consideration of the potential for tailings dam failure (including tailings dam rehabilitation failure), particularly following recent examples within the industry of such failures, are also considered threats to the success of rehabilitation. Council considers that further assessment of these threats, and appropriately scaled controls should be included in the Mining Operations Plan.

Rehabilitation objectives, outcomes and threats should be considered within an appropriate adaptive management framework that includes how the environment will respond to the management decisions that are made. Adaptive management includes clearly defined assumptions, sensitivity testing and validation of results. Adaptive management outcomes should be developed collaboratively and consultatively, enabling stakeholders directly affected by the outcomes to have buy in to the management actions and decisions that are made to respond to either the impacts that are occurring or the desired outcomes. The Mining Operations Plan does not consider these aspects of adaptive management. Council considers that the Mining Operations Plan would benefit from the inclusion and implementation of a defined adaptive management framework.

I would like to thank you for the opportunity to provide comment on Mount Owen Glendell Operations – Mining Operations Plan – 2020 to 2024. Should you have any questions or comments, please contact Mary-Anne Crawford, Manager Development and Environmental Services on 02 6578 7290.

Yours faithfully

A handwritten signature in black ink, appearing to be 'Mary-Anne Crawford', with a long, sweeping underline.

Mary-Anne Crawford
Manager Development and Environmental Services